

**UNITED STATES DISTRICT COURT  
FOR THE NORTHERN DISTRICT OF TEXAS  
DALLAS DIVISION**

UNITED STATES OF AMERICA,

v.

NO. 3:07–CR–0289(1)

DON HILL,

Defendant.

**UNOPPOSED MOTION TO RELEASE MR. HILL’S PSR**

COMES NOW, SETH KRETZER, and files this unopposed motion to release Mr. Hill’s PSR to Mr. Michael Frantz of the company JailTime Consulting.

1) The undersigned counsel was appointed to represent Don Hill in his appeal from convictions for various money laundering and public corruption offenses.

2) On information and belief, Mr. Hill has prostate cancer and is working with a company called JailTime Consulting who claim to have knowledge of how one might secure compassionate release or movement to a prison with better medical facilities.

3) Counsel is aware that he may not disseminate a PSR, and for that reason asks this Court for leave to send a copy to Mr. Michael Frantz of the company JailTime Consulting.

4) Attached as Exhibit “A” is a letter from Mr. Hill to this affect.

Respectfully submitted,



Seth H. Kretzer  
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COURT-APPOINTED ATTORNEY FOR DEFENDANT  
HILL



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Seth Kretzer

**CERTIFICATE OF CONFERENCE**

I certify that on October 21, 2015, I conferred with AUSA Wes Hendrix who is  
UNOPPOSED to the relief requested herein.



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Seth Kretzer

**CERTIFICATE OF SERVICE**

I certify that a true and correct copy of the foregoing Motion was filed on the ECF  
System on this 17th day of November, 2015.



Seth Kretzer